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VIA FAX: (312) 886-0747

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April 29, 2002

ATTORNEYS AT LAW

FOR PURPOSES OF SETTLEMENT ONLY

Mr. Tom Turner
Associate Regional Counsel
U. S. EPA – Region V
Office of Regional Counsel (C-14J)
77 West Jackson Boulevard
Chicago, IL 60604



Re: Clayton Chemical Site [1 Mobile Avenue, Sauget, Illinois]

Dear Mr. Turner:

The letter constitutes the response of True Manufacturing (True) to your request for a formal communication regarding the Clayton Chemical Site by April 29th, 2002.

True replied to your initial request for a response regarding participation in the resolution of immediate concerns facing this Site and has been represented at all subsequent meetings, including the most recent meeting held on April 24th, 2002.

During this last meeting, a draft Administrative Group Agreement was reviewed in an attempt to establish a framework by which the identified potentially responsible parties will be able to equitably work together to resolve the issues at the Clayton site. Due to the number of parties present, the absence of key parties, and other substantive issues, a formal agreement has not been achieved.

True is willing to continue discussions with this group of 31 named parties to perform certain work related to the site despite our belief that True is a deminimis party and eligible for a deminimis settlement. Moreover, because True had not sent anything to this Site since February 28, 1996, it is almost inconceivable that any of the liquid waste currently accumulated on-site originated from True.

While we recognize that the removal of the liquid requires immediate attention, we also note that this discussion is hamstrung because there is no formal agreement in place that would allow this group to move forward. Moreover, as a party that contributed (even accepting IEPA's numbers) less than one-half of one percent to the total volume, we are not in a position to influence the decision-making of this group.



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As noted, we will continue to work with EPA and this group of potentially responsible parties identified by EPA. However, we also hope to expedite our removal from this case based on clear information from manifest records indicating that True is well below the 10,000 gallon threshold when the solid waste portion of its shipment is factored into the equation, and further, that True did not ship any materials to the Site prior to 1992.

Moreover, True would not even appear on this list of 31 companies if it were given an opportunity to make the same argument to EPA that was used to exempt the majority of drycleaners. True can demonstrate that most of its waste should be classified as solid waste. According to its manifests, 79% of the waste shipped to the Site during 1995 and 1996 were clean-up "rags." These paper towels were used in the maintenance of a screen printing operation. The characterization of this waste stream for 1996 shows a specific gravity of .36 with no free liquids.

In summary, we understand that a request for additional time has been made by several of members of this listed group. If granted, True will continue to participate with this group despite our strong belief that we have an extremely limited role. It remains the desire of True Manufacturing to reach a reasonable and fair resolution of these issues and avoid additional and unnecessary expenses for legal and consulting fees.

Thank you for your consideration.

Sincerely yours,

Roger Walker

RAW/

CC: Charlie Hon, True Manufacturing



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